

Exhibit A

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS
MOLINA, JHONY SILVA, MARIA ELENA
HERNANDEZ, O.C., SANDHYA LAMA, S.K.,
TEOFILO MARTINEZ,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-05687-TLT

**PLAINTIFF NATIONAL TPS
ALLIANCE'S REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
DEFENDANT U.S. DEPARTMENT OF
HOMELAND SECURITY (SET ONE)**

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PROPOUNDING PARTY: Plaintiff National TPS Alliance

RESPONDING PARTY: Defendant U.S. Department of Homeland Security

NO.: One

Plaintiff National TPS Alliance hereby requests that Defendant U.S. Department of Homeland Security (“DHS”) produce for inspection and photocopying all documents and tangible things responsive to the categories described below to the attention of Emilou MacLean at the offices of ACLU of Northern California, 39 Drumm St., San Francisco, CA 94111 or via electronic submission to Plaintiffs’ counsel. For purposes of responding to these requests, in addition to producing responsive documents and communications maintained in centrally located systems, folders (electronic or physical), or databases, responsive documents and communications should be produced for the custodians identified or described in the attached Exhibit 1 – Custodians.

REQUEST FOR PRODUCTION NO. 1:

All draft and final USCIS Decision Memoranda concerning the 2025 periodic review of TPS for Honduras, Nicaragua and Nepal.

REQUEST FOR PRODUCTION NO. 2:

The fully-executed “Record of Clearance and Approval” (or the equivalent approval document), with attachments, for the 2025 decisions to terminate TPS for Honduras, Nicaragua and Nepal, and to publish the terminations in the Federal Register.

REQUEST FOR PRODUCTION NO. 3:

All communications with or involving DHS personnel regarding the periodic review of the TPS designations of Honduras, Nicaragua and Nepal in 2025, and the decisions whether to extend or terminate those designations.

Date: August 6, 2025

Respectfully submitted,

ACLU FOUNDATION
OF NORTHERN CALIFORNIA

/s/ Emilou MacLean

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Attorneys for Plaintiffs

Exhibit 1 - Custodians

- I. Individuals Who Have Signed Relevant Records of Clearance and Approval
 - A. Signatories of Clearance and Approval Records for Decisions to Terminate TPS for Honduras, Nicaragua, or Nepal
 - B. Signatories of Clearance and Approval Records for Decisions to Publish the Federal Register Notices Terminating TPS for Honduras, Nicaragua or Nepal
- II. Senior DHS Leadership
 - A. DHS Secretary Kristi Noem
 - B. DHS Secretary Kristi Noem’s Executive Assistant
 - C. DHS Senior Advisor Corey Lewandowski
 - D. DHS Senior Counselor Rob Law, Nominee for DHS Undersecretary, Office of Strategy, Policy and Plans
 - E. DHS Deputy Secretary Troy Edgar
 - F. DHS Senior Advisor and General Counsel Nominee James Percival
 - G. DHS Senior Advisor Joseph Guy
 - H. (Former) DHS Senior Advisor Joe Edlow
- III. DHS Office of General Counsel (who have been leading the early TPS decisionmaking process)
 - A. General Counsel
 - Joseph Mazzara
 - B. Personnel Involved in TPS Decisionmaking
 - Christina McDonald, Associate General Counsel for Regulatory Affairs
 - Nader Baroukh
- IV. USCIS Senior Leadership
 - A. USCIS Director
 - Jennifer Higgins
 - Kika Scott
 - Joe Edlow
 - B. USCIS Chief of Staff to Director
 - Aaron Calkins
- V. USCIS Subject Matter Experts—Office of Policy & Strategy (OP&S)
 - A. Chief
 - Samantha Deshommes
 - B. Policy Advisor(s) (with a role related to TPS)
 - Amany Ezeldin
 - Karine Noncent
 - OP&S Policy Advisors involved in drafting the USCIS Decision Memos for Honduras, Nepal and Nicaragua

- 1 C. Humanitarian Affairs Division
- 2 ▪ Rena Cutlip Mason, Division Chief
- 3 ▪ Sasha Ridley
- 4 VI. USCIS Country Conditions Experts—Refugee, Asylum and International Operations
- 5 Directorate (RAIO)
- 6 A. Associate Director Ted Kim
- 7 B. RAIO personnel involved in country conditions review for Honduras, Nepal or
- 8 Nicaragua
- 9 VII. USCIS Operational Personnel—Service Center Operations Directorate
- 10 A. Associate Director Connie Nolan
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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of August, 2025, I served, or caused to be served, the foregoing document described as **PLAINTIFF NATIONAL TPS ALLIANCE'S REQUESTS FOR PRODUCTION OF DOCUMENTS TO DEFENDANT U.S. DEPARTMENT OF HOMELAND SECURITY (SET ONE)** via email at the email address(es) listed below:

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/s/ Emilou MacLean
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